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Andrew G. Hunt, Esq.
Attorney Robert and Pamela Janega

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

**SEARS HOLDING CORPORATION, et al.,

Debtors.**

Chapter 11

Case No. 18-23538

Jointly Administered

**DECLARATION OF ANDREW HUNT IN SUPPORT OF THE OBJECTION OF
ROBERT AND PAMELA JANEGA TO TRANSFORM HOLDCO LLC AND
TRANSFORM SR BRANDS LLC's MOTION TO ENFORCE**

I, Andrew Hunt Esq., make this declaration pursuant to 28 U.S. Code § 1746 and declare as follows:

1. I am an attorney admitted to practice in the State of New York and the United States District Court for the Southern District of New York.
2. I represent Robert and Pamela Janega and make this Declaration in connection with the Janegas' Objection to the Motion to Enforce filed by Transform Holdco LLC and Transform SR Brands LLC (collectively "Transform"). ECF No. 10798.
3. A True and Correct copy of the Complaint filed by the Janegas in the Circuit Court of Cook County (hereinafter "Cook County action") against, among others, Transform is attached as Exhibit A hereto.

6. A true and correct copy of the Notice of Appearance of attorneys on behalf of Transform in the Cook County action is attached as Exhibit B hereto.

7. Electrolux removed the Cook County action to the United States District Court for the Northern District of Illinois on July 28, 2021. *Janega et al. v. Electrolux Home Prod. Inc.* 1:21-cv-03998, ECF No. 1 (N.D. Il.).

8. The Janegas thereafter filed a Motion for Remand on August 25, 2021. *Janega et al. v. Electrolux Home Prod. Inc.* 1:21-cv-03998, ECF No. 12 (N.D. Il.).

9. A true and correct copy of Transform's response to the Janegas' Motion to Remand is attached as Exhibit C hereto.

10. A true and correct copy of the Northern District of Illinois' February 17, 2022 Opinion and Order is attached as Exhibit D hereto.

11. A true and correct copy of Transform's October 25, 2022 Motion to Dismiss is attached as Exhibit E hereto. For brevity, exhibits have been removed.

12. A true and correct copy of the November 14, 2022 Order of the Circuit Court for Cook County is attached as Exhibit F hereto.

13. On November 3 and December 27, 2022, the Janegas served written discovery requests on Transform. On November 4, 2022, Transform served written discovery requests on the Janegas.

14. Though Plaintiffs have duly responded to Transform's written discovery requests, Transform has not responded to Plaintiffs' written discovery requests.

15. A true and correct copy of the February 6, 2023 email exchange between counsel for the Janegas and counsel for Transform is attached as Exhibit G hereto.

I declare under the penalty of perjury that the forgoing is true and correct to the best of knowledge, information, and belief.

Date: March 10, 2023
East Norriton, PA

/s/ Andrew Hunt
Andrew Hunt